

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LIBERTY MUTUAL FIRE INSURANCE CO.
AND LIBERTY INSURANCE CORPORATION,

Plaintiffs,

v.

SPRING CITY ELECTRICAL MANUFACTURING
COMPANY AND SCF INVESTMENTS, INC. AND
MILLER AND BRINK OF CALIFORNIA, INC. AND
WESTERN LIGHTING CO.,

Defendants.

: CIVIL ACTION
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NO. 02-2785
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ANSWER TO COMPLAINT

Defendants, by and through their counsel, hereby answer the Complaint as follows:

- 1.- 4. Admitted upon information and belief.
5. Admitted.
- 6.- 8. Denied.
9. Denied. By way of further answer, as the result of payment made, the amount now in controversy is less than \$75,000.
10. If and to the extent that there is jurisdiction, the existence of which is denied, the existence of venue in this District is admitted.
11. Admitted.
12. Denied as conclusions of law.
13. Admitted.

14.–16. Admitted on information and belief.

17. The averments of paragraph 17 of the Complaint are deemed to be denied because defendants lack knowledge or information sufficient to form a belief as to the truth of said averments.

18. Denied.

19. Defendants incorporate paragraphs 1 through 18 above as if fully set forth.

20.– 21. Denied.

22. Defendants incorporate paragraphs 1 through 21 as if fully set forth.

23. The averments of paragraph 23 of the Complaint are deemed to be denied because defendants lack knowledge or information sufficient to form a belief as to the truth of said averments.

24. Defendants incorporate paragraphs 1 through 23 above as if fully set forth.

25. Denied as a conclusion of law.

26 – 28. Admitted.

29. The averments of paragraph 29 of the Complaint are deemed to be denied because defendants lack knowledge or information sufficient to form a belief as to the truth of said averments.

30. Denied as a conclusion of law.

WHEREFORE, defendants demand judgment in their favor dismissing the Complaint, plus costs, attorneys' fees, and such other relief as the Court deems appropriate under the circumstances.

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Attorneys for Defendants

Of Counsel:

Montgomery, McCracken,
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CERTIFICATE OF SERVICE

I, Meghan M. Thomsen hereby certify that on this 27th day of June 2002, I caused a true and correct copy of the foregoing Answer to Complaint to be served by first class mail, postage prepaid, addressed as follows:

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Meghan M. Thomsen